



EPA Region 5 Records Ctr.



317106

January 10, 2007

Mr. Timothy Fischer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report December 1 – December 31, 2006**

Dear Mr. Fischer:

Enclosed is the Sauget Sites Area I Monthly Report for the December 2006 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith". The signature is fluid and cursive, with a large initial "S" and "D".

Steven D. Smith
Project Coordinator

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski - Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: January 10, 2007
Period Covered: December 1, 2006 - December 31, 2006

Work Performed during the Reporting Period

Conditional approval of the plan to carry out a soil vapor investigation was received from the Agency on November 16th, subject to approved changes being made to the Work Plan and submission of a final document incorporating those changes. At that time, the Agency also approved the start of field activities in advance of the submission of the revised Work Plan. Soil vapor sampling activities started on November 29th, but were temporarily halted on November 30th because of bad weather. Sampling resumed on December 4th, but was halted again on December 5th because snow melt flooded the probe holes during probe installation. Sampling resumed on December 9th and was completed on December 11th. The samples are currently being analyzed and preliminary unvalidated results are expected in the middle of January.

Activities described in the Work Plan for DNAPL Recovery at BR-I, approved by the Agency in a letter dated September 12, 2006 and which began on October 31st continued through this period. Previously in November, rehabilitation of BR-I installation of a down-hole pump and removal of DNAPL from the well occurred. A total of approximately 22 gallons of liquid, of which about 6 gallons were DNAPL, were removed on November 21st and a total of 16.75 gallons of liquid, of which 7.75 gallons were DNAPL were removed on November 28th. During this Reporting Period, pumping took place on December 5th, 14th, 19th, and 27th. On each of these occasions the total fluid volume removed from the well varied between 16 and 16.5 gallons, with the DNAPL volume varying between 6.75 and 7.25 gallons. The well will be pumped weekly until the week of March 2nd in order to evaluate the rate of DNAPL recovery. The next pumping event is scheduled to occur on January 3rd. Based on the results thus far, it appears that the DNAPL is recovering at a rate of slightly less than one gallon per day.

A meeting with the Agency was held on December 8, 2006. At that meeting, the following topics were discussed:

- **Dead Creek Ecological Assessment** - It was noted that with the removal of soils that contained constituents at concentrations above relevant RBCs is complete. The remaining bottom soils in Dead Creek pose no ecological risk because any constituents that remain are all below levels of concern. As a means of documenting this, a Technical Memorandum (Tech Memo) will be prepared that will document the basis for previously approved, site specific RBCs, and will include the confirmation sampling results that demonstrate the removal of the soils that contained constituents at concentrations above these levels. This Tech Memo will be submitted in February.
- **Potential Groundwater Impacts** - It was noted that the selection of remedial actions at Sauget Area 1 would be influenced by the possibility of groundwater constituents from Area 1 impacting the Mississippi River. It was agreed that the regional groundwater model being developed in conjunction with the Area 2 RI/FS would be used to evaluate this possibility. It was also agreed that tetrachloroethene, Trichloroethene, dichloroethene and vinyl chloride need to be included in the contaminant transport model since they are all present in the groundwater downgradient of Site I.
- **Remedial Alternative Arrays** - It was agreed that a Tech memo outlining the various Alternative Arrays would be prepared at the start of the FS. The document will include identification of the remedial action objectives (RAOs), the preliminary identification of ARARs, the identification of the alternative arrays, and a brief discussion of each of the arrays. The Tech Memo will be prepared once the regional groundwater model is completed.

Potential Alternative Arrays were also discussed in a general way. However, it was agreed that detailed discussion of the potential arrays should be deferred until the groundwater model development was complete.

- An updated project schedule was presented by CH2M Hill. .

Attachments

There are no Technical Memoranda or data submitted with this report.

Work Scheduled for Next Reporting Period

- Complete analyses of soil vapor samples and validate the results.
- Prepare final Work Plan for soil vapor sampling, including approved revisions.
- Continue to pump and remove liquids from BR-I. .
- Begin preparation of the Ecological Risk Assessment Tech Memo for Dead Creek.